

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both
individually and as Legal Guardian of
Shane Allen Loveland; and JACOB
SUMMERS

CASE NO. 8:18CV127

Plaintiff(s),

v.

THE GOODYEAR TIRE & RUBBER
COMPANY

Defendant(s).

**PLAINTIFFS' RESPONSE TO GOODYEAR'S MOTION IN LIMINE TO PROHIBIT
USE OF DISCOVERY IN OTHER LITIGATION**

Plaintiffs submit this Response to Goodyear's Motion in Limine to prohibit use of discovery in other litigation.

I.

Plaintiffs do not intend to offer any discovery materials or depositions from other litigation which has not been specifically disclosed in this case. If it became necessary for some reason to offer materials or testimony which had not been disclosed in this case, Plaintiffs would approach the bench.

II.

The parties reached agreement regarding the use of certain depositions taken in prior Goodyear lawsuits. Plaintiff does not object to Goodyear's proposal to redact the case name from the transcripts.

Respectfully Submitted,

KASTER, LYNCH, FARRAR & BALL, L.L.P.

Dated: February 11, 2020

By 

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CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that on February 11, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

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